

APPENDIX A

Public and Agency Comments and Forest Service Responses



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
620 SW Main Street, Suite 201
Portland, Oregon 97205-3026



9043.1

IN REPLY REFER TO

ER12/788

Electronically Filed

December 7, 2012

Jerry Ingersoll
Forest Supervisor
Siuslaw National Forest
855 Highway 101
Reedsport, OR 97467

Dear Mr. Ingersoll:

The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Oregon Dunes NRA Management Area 10(C) Designated Routes Project. The Department does not have any comments to offer.

We appreciate the opportunity to comment.

Sincerely,

Allison O'Brien
Regional Environmental Officer

Roxana Grant, MBA
Executive Director
Downtown Roseburg Association
912 SE Washington Avenue
Roseburg, OR 97470



USFS
Michele Holman Jones
District Ranger
Central Coast Ranger District/Oregon Dunes NRA
Siuslaw National Forest
Waldport, OR 97394

I write this letter in opposition to the closures proposed for the Douglas County Dunes.

We here in the Downtown Roseburg Association are trying to keep business alive and well in our Downtown area.

The proposed closure in Douglas County would have a huge impact on some of our Downtown businesses. This type of impact has far reaching economic downside. As you well know any change that causes a hardship in one area that is interdependent on another cause a domino effect. Local business would be affected.

When the Congress gifted the lands for recreational use, I am sure they did not mean for it to be given and then taken away. I base this on the "minimization" by previous NEPA decisions. Ie: 1970 ODRNA Management Plan, reduction by approx 47%, down to 15000 acres. 1994 ODRNA Management Plan adoption another reduction of 5930 acres. The 10 (C) zoning creates an illusion that 4455 acres of designated routes are available for OHV use, reality is only 10 miles of designated routes exist in Zone 10 (C) that acreage is reduced to less than 1 acre(actual land footprint of the routes). Between 1972 and 2011 the acreage available for riding has been reduced from 28000 acres down to just below 6000 acres. 20% of the NRA is available for legal OHV use today. (BRC 2013)

Riding areas are disappearing faster than they are being created.

As the Executive Director of the DRA I am opposed to this closure of riding areas, as the impact will be more far reaching than just the dunes and the riders.

Respectfully,

A handwritten signature in dark ink, appearing to read "Roxana Grant", is written over the typed name and title.

Roxana Grant, MBA
Executive Director
Downtown Roseburg Association



BOARD OF COMMISSIONERS

DOUG ROBERTSON

JOSEPH LAURANCE

SUSAN MORGAN

1036 S.E. Douglas Ave., Room 217 • Roseburg, Oregon 97470 • (541) 440-4201

January 18, 2013

Angie Morris, Recreation Planner
Siuslaw National Forest
855 Highway 101
Reedsport, OR 97467

RE: Oregon Dunes NRA Management Area 10(C) Designated Routes Project Draft Environmental Impact Statement Coos, Douglas and Lane Counties, Oregon

Dear Ms. Morris:

The Board of County Commissioners for Douglas County appreciates this opportunity to provide comments on the Draft Environmental Impact Statement ("Draft EIS") on the "Oregon Dunes NRA Management Area 10(C) Designated Routes Project. The Oregon Dunes NRA is an important social, economic, recreational and biological resource of the local community and Douglas County.

The Board has reviewed the Draft EIS and submits the attached comments for your review.

While not specifically addressed in the purpose and need of the Draft EIS, the Board wishes to also direct your attention to Section 12 of the Oregon Dunes National Recreation Area Act (P.L. 92-260) wherein the Secretary was to establish an advisory council:

"The Secretary shall establish an advisory council for the Oregon Dunes National Recreation Area, and shall consult on a periodic and regular basis with such council with respect to matters relating to management and development of the recreation area. The members of the advisory council, who shall not exceed fifteen in number, shall serve for individual staggered terms of three years each and shall be appointed by the Secretary as follows:

(i) a member to represent each county in which a portion of the recreation area is located, each such appointee to be designated by the respective governing body of the county involved. . . ." id. at Section 10 (16 U.S.C. §460z-10).

The Board of Commissioners request that as a separate nondiscretionary action, the Secretary establish the advisory committee. In the absence of the Section 10 committee, the Forest Service is arbitrarily avoiding the consultation requirements, and benefits, of the Act.

We appreciate your discussion providing history relative to the time constraints and process required in implementing the original mandate to appoint members to an advisory council per P.L. 92-260. Further, we recognize and appreciate that an ad-hoc committee (OHV Designated Routes Working Group) was established to advise on the transportation issues that are the subject of the Draft EIS. The efforts of this working group are appreciated and were clearly invaluable to the Forest Service in preparing this proposed action. We nonetheless urge you to either appoint the P.L. 92-260 advisory committee, or, in the alternative, continue the advisory working group on a permanent basis. We feel strongly that an on-going advisory group will positively inform the management discussion related to the recreation area, especially during the implementation phase of this project. It will also provide a forum for the recreating citizens and Siuslaw National Forest to share information, discuss issues and reach consensus. Douglas County requests that the committee include two members which are appointed by the Board of County Commissioners of Douglas County. As you initiate the new planning process in 2014, the advisory committee would be invaluable in helping to define the scope of the analysis, identifying relevant issues, and, in assisting in development of alternatives.

A second issue that is not necessarily part of the purpose and need but one that we believe should be addressed at this time, is the Dune restoration, specifically control of the beach grass (*e.g. Amophila arenaria*) that originated with artificial plantings. The control of this vegetation was a focus of the original Act and one we believe can be partially addressed through the management of off-road vehicle use. We understand that the special off-road vehicle ad hoc committee raised this issue and recommended that this be a separate alternative. We, likewise, recommend that this recommendation be incorporated into the final plan.

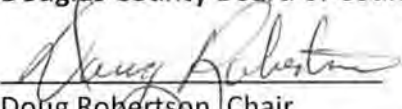
Further, it is important to recognize that access to the recreational opportunities within the Oregon Dunes NRA is a critical element and foundation of the economy of the Winchester Bay- Reedsport area and Douglas County as a whole. Over the years, as fishing and logging have been adversely impacted, ATV riding has increased in economic importance. Maintaining a diversity of riding opportunities is a critical aspect of providing the recreational opportunities envisioned when the Oregon Dunes NRA was enacted.

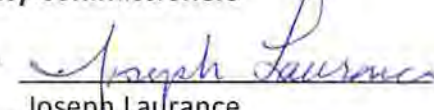
It is also important that whatever option you select maintain the diversity of recreational riding opportunities. Therefore we request that the recreation opportunities on the upland (forested) portion of the Middle Riding Area be open subject only to limitations necessary to address safety issues.

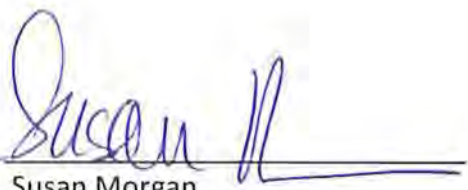
The Board of Commissioners appreciates this opportunity to submit the attached comments. Based on the current proposed alternatives, the Board supports the adoption of Alternative 5 as it is the most consistent with the plans and policies of Douglas County.

Respectfully submitted,

Douglas County Board of County Commissioners


Doug Robertson, Chair


Joseph Laurance


Susan Morgan

ATTACHMENT A
COMMENTS OF THE DOUGLAS COUNTY BOARD OF COUNTY COMMISSIONERS

On the

**OREGON DUNES NRA MANAGEMENT AREA 10(C) DESIGNATED ROUTES PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT.**

1. The Legislative History at the time the Oregon Dunes NRA was created, clearly demonstrates Congress' intent that the area be administered to provide for public recreation use and enjoyment. Conservation of scenic, scientific, historic, and other values contributing to such enjoyment was in the context of providing for this recreation use and enjoyment. The management of and the designation of, MA 10(C) and MA 10(B) trails must be in the context of the original Act.

2. Douglas County notes that when the relationship between vegetation management and transportation was raised in the original Act, the Legislative History referenced that the guiding principle was that in the more developed areas the Forest Service was to maintain native vegetation and avoid alteration through clearing for roads and facilities and through adequate control of public use. Likewise, in undeveloped areas vegetation management was to be used in order to avoid damage in the fragile pioneering plant communities – the intent was that use restrictions were to be applied in order to protect these fragile pioneering communities, not generically across the landscape. The Legislative History was clear when Congress noted that the lack of vegetation in some areas is a definite recreational asset and that artificial plantings of sand-stabilizing plants are a detriment.

In the development of the MA 10(C) strategies, the Forest Service has ignored that Congress was not expressing a concern about ATV use on all vegetated areas, rather the concerns were in the context of the three issues referenced – namely maintain native vegetation, avoid alteration through clearing for roads and facilities, and, adequate control of public use. It was with these concepts in mind that Congress referenced the need for a buffer of vegetated, undeveloped land be maintained between the active dunes and developed property – not maintenance of all vegetative areas. Douglas County is of the opinion that the concern over ATV use along historic pioneered roads within the vegetative areas must be considered in the original context. Since the Draft EA discussion relative to the impact of ATV use on vegetated trails does not distinguish between (a) vegetative buffers for developed facilities, (b) damage to fragile pioneering plant communities, or, (c) the benefit of buffers between active dunes and improved property, the proposed actions are inconsistent with the Act. It is only those historic and cultural routes that are inconsistent with this three part test that should be closed in the MA 10(C) context. Trails that do not fall within this category should be designated for access to the beach.

3. In assessing which roads are necessary for closure based on concerns over vegetation, the Forest Service must recognize that Congress clearly envisioned that additional roads and recreational facilities would become necessary in the future. Congress specifically noted that vegetation would need to be removed in places for construction of these facilities and, that in doing so, adequate controls would be established that accommodated these additions as well as avoided adverse impacts. The proposed action does not consider the question of whether these routes through the MA 10(C) areas are

consistent with Congress' recognition that additional roads and facilities would be necessary – nor does it consider how other forms of control measures and management techniques would allow these routes to be left open while meeting the objectives of Congress. The goal of minimizing impacts must be read in the context of the entire legislation not just the MA 10(C) goals.

4. Douglas County agrees with the Forest Service that historic routes that connect sand camping areas and private/state/county in-holdings to the open riding areas be classified as open for ATV use.

5. The Oregon Dunes NRA is one of the major economic driving forces within coastal Douglas County. Congress recognized the economic value of the NRA and expressly noted that the designation would increase recreational use and in turn increase recreational expenditures. This was one of the original guiding principles underlying the Act. Congress expected the NRA would increase from the pre-Act usage levels to 4.3 million visitor days by 2000. Further, it anticipated another 5 million visitor days of use will probably occur on lands and waters adjacent to the NRA. These combined uses were expected to generate about \$54 million annually. The Forest Service, however, reports in its economics analysis that usage is only 1.1 million visitor days (of which OHV use is considered to be 650,000) and that the economic contributions are substantially lower at \$2.5 million for OHV use. In assessing the proposed impact of the closing of roads and trails in the MA 10(C) areas, the Forest Service needs to closely examine why the projected increases did not occur; whether closing these historic trails will reduce any of the recreational uses; and, examine whether leaving them open will lead to increases in the user numbers and economic impacts. There is a significant disconnect with the 4.3 million visitor days that were anticipated to occur between 1972 and 2000 versus what is actually occurring. The goal of minimizing impacts must be read in the context of the entire legislation. Since there is a significant disparity between the Act's anticipated economic outputs and the actual outputs, the Forest Service should reexamine the economics with a methodology that actually examines the differences rather than assume no ability to distinguish between alternatives.

6. It is difficult to ascertain from the Draft EIS whether the risk assessment relative to introduction of the various invasive species is driven by the introduced beach grass or other species. While there is variation between the various alternatives, it is difficult to ascertain what species are driving the comparisons. It is notable that while the risk is attributed to be high under some alternatives, the Forest Service nonetheless concludes that continuation of the user-developed historic trails is not considered to have an effect on the current extent of native vegetation in the project areas. It is questionable whether invasive species risk is in fact a true driving issue that allows separation between the alternatives. Further, based on Douglas County's experience in the management of invasive aquatic species, a management technique that can greatly aid in reducing invasive species is the installation of vehicle washing facilities. In this case, washing facilities at public and private campgrounds and trail heads would be one effective tool that would reduce the risk across all alternatives.

7. Douglas County is concerned that the spread of vegetation into areas that were once open sand is a new circumstance that justifies redesignating these vegetated trails as MA 10(B) open riding. The historic photographs presented by Gary Leif provide an excellent graphic display of how the current management is not addressing the vegetation changes. The vegetation is clearly intruding on areas that were open sand riding areas at the time the Act was adopted. Further, your proposal to close trails that are in areas that were open sand in the 1970's is inconsistent with the legislative history accompanying the Act.

8. Notwithstanding that the purpose and need is in the context of transportation, the underlying issue is vegetation management. Given that beach grass is a driving force in the changing plant communities and the rider access, the impacts of beach grass encroachment on transportation/rider access and strategies to control beach grass should be addressed as environmental impacts as well as connected and cumulative actions.
9. Measuring rider safety solely in the context of injuries reported to medical facilities is one way to monitor safety; however, there are other more sensitive ways to measure rider safety that would allow comparison between alternatives. For example, the interaction rate between riders would be a reliable measure of safety – namely the less interaction the less likely for rider to rider accidents. Further, the Douglas County Sheriff has indicated that there is statistical data that tracks injuries to OHV riders within the riding areas. We recommend that the ROD and final EIS incorporate this information which is available through the local law enforcement agencies. We suggest the Forest Service reexamine the rider safety issue in both of these contexts.
10. All alternatives should be explored in the context of minimizing management and enforcement costs. If the selected alternative cannot be logically, economically or practically enforced, then it does not achieve the goals of the Oregon Dunes NRA.
11. The final decision should recognize the historic overlook areas on the western side of Clear Lake in the Middle Riding Area. These areas should be classified as designated open trails under 10(C) and maintained in their historic primitive riding condition.
12. In the Middle Riding Area, the connecting trails at Banshee Hill and to the immediate south thereof should be classified as either 10(B) areas or as 10(C) designated as open areas.



Bruce Hanna

State Representative, District 7

January 22, 2013

Mr. Jerry Ingersoll
c/o Angie Morris, Recreation Planner
Siuslaw National Forest
855 Highway 101
Reedsport, OR 97467

Re: Response to Draft EIS Area 10(c) Designated Routes Project

Mr. Ingersoll:

With respect, I write today to oppose the proposed options presented in the Forest Service's Draft EIS regarding the Oregon Dunes National Recreation Area (ODNRA) 10c designated routes project. As a lifelong resident of Douglas County, the sitting State Representative for rural Douglas and Lane Counties, and an avid outdoor enthusiast, I find this proposal both frustrating and flawed.

In 1972, Congress established the ODNRA, recognizing that Oregon's landscape provides unique recreational opportunities for families. Of the 28,900 acres originally dedicated to this area, more than half have now been closed to OHV use. The current DEIS runs counter to the intent of Congress when it established the ODNRA as a primarily open riding area "to provide for the public outdoor recreation use and enjoyment." This intent rings true today, but this proposal runs counter to it.

Further, the proposal places additional, cumbersome restrictions on already regulated use of land nationally recognized as a destination for outdoor recreation. I urge you to consider the economic impact of this proposal. OHV activity in the Dunes is a \$270 million industry. Further restrictions will only serve to reduce that number, the impact of which could be enormous in a part of the nation already experiencing severe economic depression.

Safety and environmental concerns in the ODNRA are of course critical. I remain committed to ensuring Oregonians and visitors to our great state are both safe and have a destination to visit for generations to come. However, it is unclear how the decision to further restrict acreage in the proposed 10c designation will really accomplish these goals without causing even greater harm in the coastal communities of Coos, Douglas and Lane Counties.

In the future, I hope there is greater coordination between the USFS and local communities in identifying appropriate and effective solutions.

Sincerely,

A handwritten signature in dark ink that reads "Bruce Hanna". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Bruce Hanna
State Representative, District 7



410 S.E. Spruce Street
P.O. Box 1026
Roseburg, OR 97470
Phone 541.672.2648
Fax 541.673.7868
www.RoseburgAreaChamber.org

January 16, 2013

Ms. Angie Morris, Recreational Planner
Oregon Dunes National Recreation Area
Siuslaw National Forest
855 Highway 101
Reedsport, OR 97467

Re: Oregon Dunes NRA Management Area 10(C) Designated Routes Project / Draft EIS

Dear Ms. Morris:

On behalf of the Roseburg Area Chamber of Commerce (RACC) and the 600 Douglas County businesses we represent, please accept this letter **opposing** the proposed options presented in the USFS Draft Environmental Impact Study (DEIS) on the Oregon Dunes National Recreation Area (ODRNA) 10c Designated Routes Project.

The RACC believes the DEIS and related process is flawed on several points, not the least of which was failure to coordinate with affected counties (Douglas, Coos and Lane) and the apparent lack of consideration of the legislative intent of the National Recreation Area Act—to manage for OHV access and recreational use. At a minimum, the RACC respectfully requests the DEIS be withdrawn and that the USFS conduct and issue a supplemental EIS seeking additional input and including better alternatives than those presented in the current DEIS.

The RACC certainly has a concern regarding the public safety issues related to the options proposed in the DEIS, as expressed by local law enforcement officials. However, as an organization focused on economic viability and job growth in our region, we have an even greater concern of the significant and adverse economic impacts current DEIS proposals would have on Oregon's coastal communities in Douglas, Coos and Lane counties.

Thank you for your consideration.

Best regards,

ROSEBURG AREA CHAMBER OF COMMERCE

Debra L. Fromdahl, IOM
President & CEO

cc: The Honorable Jeff Kruse
The Honorable Floyd Prozanski
The Honorable Tim Freeman
The Honorable Bruce Hanna
The Honorable Wayne Krieger
The Honorable Jeff Merkley
The Honorable Ron Wyden
The Honorable Peter DeFazio



To advocate for and be the voice of the business community in the greater Roseburg area.

To strengthen, enhance and protect our members through political advocacy, economic development, community promotion and member programs and services.

WINCHESTER BAY MERCHANTS ASSOCIATION, INC.
A Nonprofit Public Benefit Corporation
P. O. Box 1143
Winchester Bay, Oregon 97467
wbmerchants@yahoo.com
Phone/Fax 541-271-4471

December 31, 2012

Angie Morris, Recreational Planner
ODNRA
855 Highway #101
Reedsport, OR 97467

Re: Draft Environmental Impact Statement NRA Dunes
10 (C) Area

Dear Ms Morris;

The Winchester Bay Merchants is a non-profit group made up of businesses and residents of Winchester Bay. We sponsor summertime festivals and more than any other group, speak for the merchants in the Winchester Bay area.

In your recent SOPA for the area, you have offered five different alternatives for use a system of designated trails and open area riding. This letter is written in support of the least restrictive plan being offered and we would not object to a reconsideration of an additional alternative which would open up more area. The WBM worked closely with the reorganizational planning for the consolidation of the ownership of the land some years back so there would be less governmental agencies making conflicting and competing decisions on how OHV could best use the land area. One of the considerations that does not seem to be adequately explored is the changing nature of the environment with the lessening of the inundation plain. It would seem, and there have been statements made, that within 25 years the "sand dunes" will have many times the vegetation that it has now. Your plans

should reflect this condition and make determinations that while nature does have a natural pattern which involves change, much of the reasons for the expected changes are manmade and work against the continued recreational use of the area with OHV.

Please recognize the recreational use of the sand by ATV and sandrail owners is one of the "industries" that economically supports our community and has a minimal adverse effect on the environment. As to the illogic of: because there has been no lessening of recreational users to the area, our decisions have not been adverse to the economy. OHV users are growing at a fast rate, land available for such uses are decreasing. Without a "control site" your statement that there has not been an adverse impact is not supported. I would also suggest that you review the alcohol ban Q&A on your website and not continue to advance the statement that there was a "scoping" to obtain information. Here is your Q&A on that one:


How was the public involved in this decision? Can I comment on this?

Yes, you may comment on the decision to issue this order. However, it is issued under the Forest Supervisor's administrative authorities for the purpose of addressing a serious public and employee health and safety risk. Therefore, it is not subject to the same public involvement provisions as Forest Service project planning decisions, nor is public comment likely to affect change or retraction of this order.

The WBM held the first and only public meeting on the imminent order and tried to spread the word.

Should you have any questions please feel free to contact us.

Sincerely,


Joe Coyne
President



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

December 7, 2012

Angie Morris, Recreation Planner
Siuslaw National Forest
855 Highway 101
Reedsport, Oregon 97467

Re: EPA Region 10 Comments on the on the Draft Environmental Impact Statement (DEIS) for the
Oregon Dunes NRA Management Area (EPA Project #93-013-AFS)

Dear Ms. Morris:

We have reviewed the DEIS for the Oregon Dunes National Recreation Area (ODNRA) Management Area (MA) 10(c) Route and Area Designation on the Siuslaw National Forest in Oregon. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

Section 309 of the CAA specifically directs the U.S. Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the DEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The DEIS analyzes a no action alternative and four action alternatives. The action alternatives consider variations in the number of miles of designated riding routes and areas designated for open riding. The preferred alternative (Alternative 4) would designate 2.1 miles of routes and reallocate 455 acres from MA 10(C) (Off Road Vehicles on Designated Routes) to MA 10 (B) Off-Road Vehicle Open. This alternative would also close approximately 84 miles of user-developed routes.

In our July 2011 scoping comments we indicated support for the proposed action (Alternative 2). Relative to Alternative 2, the preferred alternative (Alternative 4) reallocates an additional 221 acres to MA 10 (B) and closes 18 fewer user-developed routes. We support the proposed closure of unauthorized routes under Alternative 4, but we encourage the Forest to consider bringing forth elements from Alternatives 2 and 3 as the final preferred alternative is developed.

In particular, we note that the reallocation of areas A4 and portions of A16 under Alternative 4 would result in high impacts to native plant associations (Table 29). We also note that area A16 still has many intact portions of native vegetation and likely still supports use by nesting, migrating and wintering birds. As noted on page 106 of the DEIS, the proposed change in management of this area to MA 10 (B) would likely cause further degradation of native vegetation, making this area less suitable for land birds. Given these potential impacts we make the following recommendations:

- 1) Revise management direction for area A4 to avoid impact to areas where shore pine/slough sedge associations are present; or pursue the management strategy under Alternative 3 for this area.
- 2) Revise management direction for area A16 to avoid impact to the 19 percent of the reallocation area that is mapped as native vegetation; or pursue the management strategy under Alternative 2 for this area.

We also note that the risk of introducing or spreading invasive species via reallocations from MA 10 (C) to MA 10 (B) is "high" under Alternative 4 (Table 30). Control of invasive plant species is discussed under Project Design Criteria (DEIS p. 51), however detail is lacking. It is stated that invasive plant species would be controlled "by the most effective means allowed." We recommend that the FEIS discuss management triggers/thresholds and measures (herbicides, biological controls, mechanical removal, etc.).

If herbicides are to be used to control infestations, mitigation measures should be identified to avoid herbicide drift to streams and wetlands during ground and aerial applications. Measures might include the identification of streamside buffers, mechanical weed removal adjacent to streams, flagging aquatic areas on the ground, spray nozzles that produce larger droplets to reduce drift, use of photodegradable dyes in herbicides, use of GPS technology, use of spray detection cards, wind monitoring, herbicide monitoring, etc.).

In addition, we believe that recommendation 2 above would substantially address the risk of invasive plant infestation by reducing the number of acres under MA 10 (B).

Due to our concerns over native plant associations, bird habitat and invasive species, we have rated the proposed alternative EC-1 (Environmental Concerns – Adequate). An explanation of this rating is attached. We appreciate the opportunity to provide comments, and we believe that the management plan will play an important role in establishing a more comprehensive and understandable system of designated routes for the ODNRA. Please contact me with any questions at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

December 7, 2012

TO: Angie Morris, Recreational Planner
USDA Forest Service

FROM: John Hanlin, Douglas County Sheriff; Craig Zanni, Coos County
Sheriff; Tom Turner, Lane County Sheriff

SUBJECT: Oregon Dunes NRA Management Area 10 (C) Designated Routes
Project, Draft Environmental Impact Statement


This letter is in response to the Draft Environmental Impact Statement for the Oregon Dunes National Recreation Area (ODNRA) Management Area 10 Designated Routes Project. It is our understanding that we are entering the final phase of the 10C process and we have several concerns. Closure of riding areas under this plan would impact areas in Coos, Douglas, and Lane Counties.

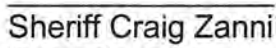
As chief law enforcement officers of our counties, entrusted to make public safety decisions that are in the best interest of those we serve, we feel our concerns and input involving the closure of public lands should be heard and considered in this planning process. We have yet to be contacted and involved in any discussions or planning relating to the ODNRA Management Area 10 (C) Designated Routes Project.

There are substantial economic impacts that would occur, but more importantly are the public safety threats that additional riding area closures would create. Contrary to the information on page 14 of the DEIS, there **are** sufficient statistics available to track injuries to OHV riders within the riding areas at the ODNRA. These statistics are tracked and available through local law enforcement agencies and the Oregon Department of Motor Vehicles. The information contained under "Rider Safety" (pg. 14) of the DEIS is incomplete and inaccurate.

There are many public safety issues that need to be accurately shared and discussed. As a cooperating agency we request the opportunity to be involved in coordinated planning of any closures of the ODNRA. We would further request that an extension to the review period be implemented to allow for this coordinated process.

Respectfully,


Sheriff John Hanlin
Douglas County


Sheriff Craig Zanni
Coos County


Sheriff Tom Turner
Lane County



LANE COUNTY BOARD OF COMMISSIONERS

Jay Bozievich
Rob Handy
Sid Leiken
Pete Sorenson
Faye Hills Stewart

December 5, 2012

Ms. Angela Morris, Recreation Planner
United States Forest Service
Siuslaw National Forest
3200 SW Jefferson Way
Corvallis OR 97331

Dear Ms. Morris:

The Lane County Board of Commissioners submits the following comment with respect to the "10C Designated Routes Project #34220". These comments were approved by our full Board of County Commissioners during their regularly scheduled meeting of December 11, 2012. Please note that Lane County previously provided comment on this issue to your office through correspondence dated August 18, 2011.

- 1) Lane County feels very strongly the congressionally mandated Advisory Committee must be reconstituted. We have previously noted that the Forest Service appears to be out of compliance with the Oregon Dunes National Recreation Act of 1972 (PL 92-260, Section 12(a)). Within our own organization we regularly and formally create and recognize advisory committees to guide our, and our Department's, actions. It is our expectation that the Forest Service follow what is clearly provided for in law with respect to this Advisory Committee.
- 2) Related to comment 1 is that Federal law is quite clear with respect to consulting with Lane County in its role as a cooperating agency. In fact, while we are pleased that the comment period for this plan was extended, we were not formally alerted to this opportunity by the USFS, and only learned of it through the communications of our concerned citizenry.
- 3) We question the finding that non-designated routes within the MA 10 (C) areas have created "...greater and unnecessary impacts to important plant communities.."; This finding appears to conflict with other statements indicating the prevalence of non-native, invasive vegetation such as European beachgrass and Scotch broom within MA 10 (C). We would urge a finding that continues to recognize the full 4,455 acres within that area be designated Open Riding 10 (B).
- 4) The economic analysis provided as part of the USFS Draft Environmental Impact Statement analysis is severely flawed. The finding of no economic impact must not remain in the final EIS, and we would ask that your office examine the analysis provided by Oregon State University on the economic benefit to Lane, Douglas, and Coos Counties provided by OHV users and visitors (many of whom travel here from Canada). This analysis shows \$86M of economic impact. The USFS finding of \$2.5M per year is without merit.

Sincerely,



Sid Leiken, Chair
Board of Lane County Commissioner



Florence Area Chamber of Commerce
290 Hwy 101
Florence OR

January 22, 2013

Re: Oregon Dunes NRA Management Area 10(c)
Designated Routes Project/Draft EIS

Ms. Angie Morris, Recreational Planner
Oregon Dunes National Recreation Area
Siuslaw National Forest
855 Hwy 101
Reedsport OR 97467

Dear Ms. Morris,

The Florence Area Chamber of Commerce is opposed to the USFS proposed closure options as contained in the current draft environmental impact study on the ODRNA 10c Designated Routes Project. We feel there are many inaccurate findings regarding the economic impact on the proposed closures contained in the study: out of a 152 page document that allegedly addresses the overall impacts, with only five pages, (14, 15, 137, 138 & 139) addressing economic impacts vs. the exhaustive detail of environmental impacts, the study of the economic impact is clearly not adequate. For example, the reference on page 137 that "...ODNRA contributes about \$2.5 million annually to the three counties within which the ODNRA is located (Coos, Douglas and Lane). It accounts for about 82 jobs within the three-county area" we feel is simply not accurate – there are probably in excess of 82 jobs alone just within the Florence area that are directly related to the use of the dunes.

While we all cherish and wish to preserve the Oregon National Dunes as it is in our own back yard, it is that fact as well that makes it a tremendous resource for our economy also. Our membership is overwhelmingly opposed to these closures, for example, one comment from our survey: *"One branch of the government or another since 1980 has closed down a logging industry, a sawmill industry, a fishing industry, and now they want to take the second step towards closing a thriving tourism industry."* It is extremely critical at this point in the economic condition of our community that we not continue to impede our area economy.

Thank you for your consideration.

Sincerely,

Cal Applebee
Executive Director

Cc: Senator Arnie Roblan
Representative Catherine McKeown
Governor John Kitzhaber
Senator Jeff Merkley
Senator Ron Wyden
Representative Peter DeFazio



BOARD OF COMMISSIONERS

DOUG ROBERTSON JOSEPH LAURANCE SUSAN MORGAN

1036 S.E. Douglas Ave., Room 217 • Roseburg, Oregon 97470 • (541) 440-4201

January 25, 2013

Angie Morris, Recreation Planner
Siuslaw National Forest
855 Highway 101
Reedsport, OR 97467

RE: Oregon Dunes NRA Management Area 10(C) Designated Routes Project Draft
Environmental Impact Statement Coos, Douglas and Lane Counties, Oregon

Dear Ms. Morris:

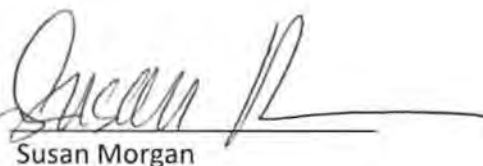
The Board of County Commissioners for Douglas County recently submitted comments on the Draft Environmental Impact Statement ("Draft EIS") on the "Oregon Dunes NRA Management Area 10(C) Designated Routes Project. It has recently been brought to our attention that a provision in the letter was not removed when new comments were added to the comment section.

The very last paragraph contained the statement that between the various current proposed alternatives, the Board found Alternative 5 as it is the most consistent with the plans and policies of Douglas County. It has come to our attention that this may be taken out of context. While Alternative 5 is the best fit among the proposed alternatives, the Board believes that none of the current alternatives meet the objectives of the Act or the policies and plans of Douglas County. The Board believes that no action should be taken until the matters can be examined in a comprehensive planning process that reexamines the land management plan and the land allocations therein.

Respectfully submitted,
DOUGLAS COUNTY BOARD OF COMMISSIONERS


Doug Robertson, Chair


Joseph Laurance


Susan Morgan